

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

*In re Terrorist Attacks on September 11, 2001*

**03 MDL 1570**

This filing applies to:

*Ashton, et al. v. Al Qaeda Islamic Army, et al., Case No. 02-CV-6977*

*Estate of John P. O'Neill, Sr., et al. v. Al Baraka Investment and Development  
Corporation, et al., Case No. 04-CV-01923 (RCC)*

*Thomas E. Burnett, Sr., in his own right as the Father of Thomas E. Burnett, Jr.,  
et al., v. Al Baraka Investment and Development Corporation, et al. Case  
No. 03-CV-5738*

**DECLARATION OF OMAR T. MOHAMMEDI  
IN SUPPORT OF DEFENDANT WORLD ASSEMBLY OF MUSLIM YOUTH IN  
SAUDI ARABIA AND WORLD ASSEMBLY OF MUSLIM YOUTH  
INTERNATIONAL'S MOTION TO DISMISS THE PERSONAL INJURY  
COMPLAINTS**

I am an attorney licensed to practice in the Southern District of New York. I am with the Law Firm of Omar T. Mohammedi, LLC, counsel to the World Assembly of Muslim Youth in Saudi Arabia ("WAMY SA") and the World Assembly of Muslim Youth International ("WAMY USA"). I submit this declaration to transmit to the Court the following documents submitted in support of WAMY SA's and WAMY USA's Motion to Dismiss the consolidated Personal Injury Complaints.

1. For purposes of this motion, our clients will be responding to plaintiffs' allegations as if alleged against both WAMY SA and WAMY USA, even though plaintiffs fail to make that distinction. For the sake of brevity, any reference that we make to "WAMY" is a reference to both WAMY SA as well as to WAMY USA unless otherwise specified.
2. Exhibit A is a copy of the Declaration of Dr. Adel Batterjee. This is the same declaration filed on or about April 9, 2005 by attorney Ashraf Nubani in his Motion to Dismiss the Burnett v. Al Baraka action.
3. Exhibit B is a copy of the Declaration of Dr. Saleh Al-Wohaibi, who holds the position of Secretary General of WAMY SA.
4. Exhibit C is a copy of a letter, along with the translation certification, sent by the former Secretary General of WAMY SA, on behalf of WAMY SA to Adel Batterjee.

5. Exhibit D is a series of letters sent between WAMY Defense Counsel and Plaintiffs' Counsel regarding Burnett Plaintiffs' delinquency in serving process on WAMY SA and WAMY USA.
6. Exhibit E is a copy of the Declaration of Maher Hanania, WAMY's previous attorney, addressing service issues with Burnett Plaintiffs.
7. Exhibit F is Burnett Plaintiffs' purported proof of service.
8. Exhibit G is a series of letters sent between WAMY Defense Counsel and Plaintiffs' Counsel regarding briefing schedule and service issues pertaining to WAMY SA and WAMY USA.

I declare under the penalties of perjury that the foregoing is true and correct to the best of my knowledge and belief.

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/s/  
OMAR T. MOHAMMEDI

Dated: November 1, 2005